UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HP TUNERS, LLC, a Nevada limited)
liability company,) CASE NO. 1:24-cv-4288
Plaintiff,) Honorable Beth W. Jantz
VS.)
WALTER COLE, an individual,)
Defendant.)
)
)

MOTION FOR ENTRY OF AGREED CONSENT JUDGMENT

Plaintiff HP Tuners, LLC ("HPT" or "Plaintiff") and Defendant Walter Cole ("Cole" or "Defendant") have agreed to finally resolve the above-captioned litigation (the "Litigation"). Pursuant to that agreement, Plaintiff and Defendant have agreed to entry of an Agreed Consent Judgment on the terms provided in the attached **Exhibit A**.

Plaintiff and Defendant jointly request that the Court enter the Consent Judgment and Permanent Injunction in the form provided and for such other and further relief as this Court deems necessary and appropriate.

Dated: January 29, 2025 HP TUNERS, LLC

By: s/ Andrew P. Bleiman
Andrew P. Bleiman (ARDC 6255640)
Mark I. Fishbein (ARDC 6206919)
Marks & Klein
1363 Shermer Road, Suite 318
Northbrook, Illinois 60062
(312) 206-5162
andrew@marksklein.com
mark@marksklein.com

Attorneys for HP Tuners, LLC

WALTER COLE

Dated: January 29, 2025

By: /s/ John P. Carlin

John P. Carlin Attorney At Law Suburban Legal Group PC 1305 Remington Road, Suite C Schaumburg, IL 60173 P: 847-843-8600 F: 847-850-2762

JCarlin@suburbanlegalgroup.com